

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**IN RE  
VITAMIN C ANTITRUST LITIGATION**

This Document Relates To:

*Animal Science Products, Inc., et al. v. Hebei  
Welcome Pharmaceutical Co., Ltd., et al.,  
Case No. 1:05-CV-00453(BMC)(JO)  
(E.D.N.Y.)*

**MASTER FILE 1:06-MDL-1738  
(BMC)(JO)**

**DEFENDANT CHINA  
PHARMACEUTICAL GROUP  
LTD.'S NOTICE OF MOTION AND  
MOTION FOR DETERMINATION  
OF FOREIGN LAW AND  
JUDGMENT ON THE PLEADINGS  
OR IN THE ALTERNATIVE  
SUMMARY JUDGMENT**

**TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that Defendant China Pharmaceutical Group, Ltd. hereby moves this Court for a determination of foreign law and judgment on the pleadings or in the alternative summary judgment. This motion is made pursuant to Federal Rules of Civil Procedure 44.1, 12, and 56, and the Court's Scheduling Order of May 16, 2012. The motion is based upon this Notice of Motion and Motion, as well as the Memorandum of Law, Expert Report of Professor Fu Jun, and Local Civil Rule 56.1 Statement of Material Facts submitted herewith.

///

///

///

///

Dated: September 28, 2012

Respectfully Submitted,  
ZELLE HOFMANN VOELBEL & MASON LLP

By: /s/ Daniel S. Mason

Daniel S. Mason  
Jiangxiao Athena Hou  
Eric W. Buetzow  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
Tel: 415-693-0700  
Fax: 415-693-0770

*Attorneys for Defendant  
China Pharmaceutical Group, Ltd.*